J,		
1	LENARD E. SCHWARTZER 2850 South Jones Blvd, Suite 1 Las Vegas, NV 89146	
٠,	(702) 307-2022	
3	TRUSTEE	
4		
5		
6		
7		
8	UNITED STATES B	SANKRUPTCY COURT
9	DISTRICT	OF NEVADA
10	In re) Case No. BK-S 14-13152 ABL
11	NEWHOUSE, BLYNTHIA JOYCE	IN PROCEEDINGS UNDER CHAPTER 7
12		TRUSTEE'S MOTION TO SELL ESTATE'S INTEREST IN VARIOUS OIL/GAS
13	Debtor.) ROYALTIES
14) Date: November 13, 2014
15) Time: 11:00 a.m.) Place: Foley Bldg., Third Floor
16	Lenard E. Schwartzer, Chapter 7 Trustee	(the"Trustee"), hereby moves this court for an
17	Order authorizing the Trustee to sell the estate's	interest in various oil/gas royalties, and alleges:
18	1. Debtor, BLYNTHIA JOYCE NEV	WHOUSE, aka Bynthia Joyce Rabb, aka Cynthia J.
19	Newhouse, aka Cynthia J. Rabb, filed for relief u	nder Chapter 7 of the United States Bankruptcy
20	Code on May 2, 2014, and LENARD E. SCHWA	ARTZER is the appointed and acting trustee in this
21	matter.	
22	2. Debtor's assets include various oi	l/gas royalties, including, but not limited to, those
23	scheduled on Exhibit "1", attached hereto.	
24	3. To date, the Trustee has collected	a total of \$572.97 from the various oil/gas royalties.
25	11111	
26		
27	11111	
28		1
- 1		

4. The Trustee has received one offer to purchase the estate's interest in the oil/gas royalties as follows:

McCulliss Oil & Gas Inc.

\$16,000.00

A copy of said offer is attached as Exhibit "2", attached hereto.

- 5. The Trustee is of the information and belief, and thereon alleges, that the offer of \$16,000.00 is reasonable and acceptance of the offer is in the best interest of the estate.
- 6. The Trustee is unaware of any claims secured by the asset to be sold. If any creditor alleges that they have a perfected secured lien against the asset, the Trustee would suggest that said lien be deemed transferred to the proceeds of the sale pending further order of this court.
- 7. The Trustee requests that in the event there is a higher offer on the asset, that the Trustee be given authority to sell the asset to the highest bidder under similar terms and conditions.

MEMORANDUM OF LAW

The duties of a trustee in a Chapter 7 filing are enumerated in 11 U.S.C. 704, which provides that:

The trustee shall--

(1) collect and reduce to money the property of the estate for which such trustee serves, and close such estate as expeditiously as is compatible with the best interests of parties in interest.

11 U.S.C. §363(b)(1) provides that:

The trustee, after notice and a hearing, may use, sell, or lease, other than in the ordinary course of business, property of the estate.

CONCLUSION

WHEREFORE, Trustee prays for an order authorizing him to (1) sell the estate's interest in the oil/gas royalties, free and clear of any and all liens encumbrances, to McCULLISS OIL & GAS INC. for \$16,000.00 under the terms and conditions set forth herein, or (2) accept any higher offer on the asset and sell the asset to the highest bidder under similar terms and conditions, and (3) execute any and all documents necessary to effectuate the sale.

Dated: October 15, 2014

TENARD E. SCHWARTZER

Trustee

DECLARATION OF TRUSTEE

I declare, under penalty of perjury, that the foregoing is true and correct, to the best of my knowledge, information and belief.

Dated: October 15, 2014

CENARD E. SCHWARTZER, Trustee

Case 14-13152-abl Doc 41 Entered 10/15/14 16:22:32 Page 4 of 8

Revenue Account

COMSTOCK OIL & GAS, LP 5300 TOWN & COUNTRY BLVD SUITE 500 FRISCO TX 75034

(972) 668-8800

PAY Fifty Six Dollars and Ninety Two Cents

BLYNTHIA NEWHOUSE

THE ORDER OF

TO

Check No Check Date Check Amount

******\$56.92 0000520422 08/29/2014

COMERICA BANK

32-75 / 1110

Void After 180 Days

THIS DOCUMENT HAS A COLORED FACE AND CONTAINS A WATERMARK THAT IS VISIBLE WHEN HELD TO THE LIGHT, ABSENCE OF THESE FEATURES INDICATES A COPY.

"OOOO520422" ::111000753: 1881118515"

"PLEASE DETACH AT PERFORATION ABOVE"

COMSTOCK OIL & GAS, LP 5300 TOWN & COUNTRY BLVD SUITE 500 FRISCO TX 75034

"PLEASE DETACH AT PERFORATION ABOVE"

Check Number 0000520422

Prod	Prod	Туре	EUSIN	MCF		Gros			200 B	11244	Table 1	Owner	AND THE PERSON	
Date	Code	Int	Price	Quantity	Value	Deduc	tions	Net	Interest	Paid Int	Value	Deductions	Ne	t Share
Property:	TX-333	-1007			SHAW UNIT 2 WEL	L1		TX Ha	rrison		Survey:	PACE J R	A-585 E	Block
05/2014	GAS	R1	4.30	1,436,24	6,178.95			5,689.44	0.00017599	0.00017599	1.09			1.00
						Deduct					26.00	Description		
						TXSEV	488.37					Texas Severance Tax	0.09	
05/2014	PPRO	R1	0.62	2,967.48	1,844,83			1,706.47	0.00017599	0.00017599	0.32			0.30
						Deduct						Description		
						TXSEV	138.36					Texas Severance Tax	0.02	
06/2014	GAS	R1	4,25	1,030.36	4,374 35			4,027.54	0.00017599	0.00017599	0.77			0.71
						Deduct						Description		
						TXSEV	345.99					Texas Severance Tax	0.06	
06/2014	PPRC	R1	0.63	2,133.76	1.353,36			1.251.86	0.00017599	0.00017599	0.24			0.22
						Deduct						Description		
						TXSEV	101 50					Texas Severance Tax	0.02	
Property:					SHAW UNIT 3 WEI	.L. 1		TX Ha				PACE J R	A-585	
05/2014	GAS	R1	4.30	488.70	2,102.48			1,935 92	0.00033558	0.00033558	0.71			0.65
						Deduct						Description	200	
						TXSEV	166.17					Texas Severance Tax	0.06	
05/2014	PPRO	R1	0.62	1,009.74	627 74			580.66	0.00033558	0.00033558	0.21			0.19
						Deduct	Q 25				9 8 96 9	Description		
						TXSEV	47 08					Texas Severance Tax	0.02	
06/2014	GAS	R1	4.25	481 65	2,044.83			1,882.71	0.00033558	0.00033558	0.69			0.64
						Deduct						Description	15	
						TXSEV	161.74					Texas Severance Tax	0.05	
06/2014	PPRO	R1	0.63	997.43	632.63			585.18	0.00033558	0.00033558	0.21			0.19
						Deduct					1400	Description		
						TXSEV	47.45					Texas Severance Tax	0.02	
Property:					SHAW UNIT 1 - T				iarrison			y: PACE J R	A-585	Block
05/2014	GAS	R1	4.30	1,005.45	4,325.64			3,982.95	0.00028053	3 0.00028053	1.21			1.1
						Deduct	341 89	-				Description Texas Severance Tax	0.10	
						INDEV	34103					TOTAL CONTROL OF TAX		
- 3	-		1	Owner		Che	ck Date:	08/29/2	014		Che	ck Amount 📥		56.92

Owner

Check Date: 08/29/2014

Check Amount ⇒

56.92

Entered 10/15/14 16:22:32 Page 5 of 8 Case 14-13152-abl Doc 41

VALENCE OPERATING COMPANY 600 Rockmead Drive, Suite 200 Kingwood, TX 77339

OWNER NO.

BLYNTHIA NEWHOUSE

CHECK DATE

CHECK NO.

08/25/2014 00704847

Sale				SALES		100% SALI	ES			OWN	ER INTERES	Т	
Date	Proc	d Int	Price	Quantity	Gross	Taxes	Deduct	Net	Decimal	Gross	Taxes	Deduct	Net
Locat	ion: 4	4253	6001 (CULLEN, J.B. UNIT	#1 County:	HARRISON	State: TX						
05/14		R	4.39	227	995.43	69.59	0.00	925.84	0.00012690	0.13	0.01	0.00	0.12
06/14 Locat		R ‡2536	4.48 6002 (294 CULLEN, J.B. UNIT	1,316.64 #2 County:	92.04 HARRISON	0,00 State: TX	1,224.60	0.00012690	0.17	0.01	0.00	0.16
05/14		R	4.39	180	789.33	55.18	0.00	734.15	0.00012690	0.11	0.01	0.00	0.10
06/14 Locati	100	R 12536	4.48 6003 (189 CULLEN, J.B. UNIT	846.42 #3 County:	59.17 HARRISON	0.00 State: TX	787.25	0.00012690	0.10	0.01	0.00	0.09
05/14		R	4.39	3,539	15,519.00	1,084.92	0.00	14,434.08	0.00012690	1.98	0.13	0.00	1.85
05/14	3	R	97.88	38	3,719.33	171.09	0.00	3,548.24	0.00012690	0.47	0.02	0.00	0.45
06/14	2	R	4.48	2,597	11,630.35	813.03	0.00	10,817.32	0.00012690	1.47	0.11	0.00	1.36
06/14 Locati			101.09 1004 C	34 CULLEN, J.B. UNIT #	3,437.13 #4 County:	158.11 HARRISON	0.00 State: TX	3,279.02	0.00012690	0.43	0.02	0.00	0.41
05/14		R	4.39	2,016	8,840.43	618.02	0.00	8,222.41	0.00012690	1.11	0.08	0.00	1.03
06/14 Locati	-	R 2536	4.48 005 C	2,313 ULLEN, J.B. UNIT #	10,358.49 \$5 County:	724.12 HARRISON	0.00 State: TX	9,634.37	0.00012690	1.31	0.10	0.00	1.21
05/14		R	4.39		18,373.71	1,284.49	0.00	17,089.22	0.00012690	2.33	0.16	0.00	2.17
05/14	3	R	97.88	35	3,425.70	157.58	0.00	3,268.12	0.00012690	0.43	0.02	0.00	0.41
06/14	2	R	4.48	3,305 BUTION STATEMENT	14,801.04	1,034.68	0.00	13,766.36	0.00012690	1.88	0.13	0.00	1.75

Int: INTEREST W: Working R: Royalty	Prod:	PRODUCT 1: Oil-BBL 2: Gas-MCF	VISIT OUR WEBSITE AT: www.valenceoperating.com	OWNER TOTAL:
O: Override		3: Condensate-BBL 4: Plant Prod-BBL		

PLEASE DETACH

R THIS CHECK HAS A COLORED BACKGROUND AND CONTAINS MULTIPLE SECURITY PEATURES. SEE BACK FOR DETAILS

VALENCE OPERATING CO.

600 ROCKMEAD #200 PH. 281-359-3659 KINGWOOD, TX 77339-2111

BANK OF AMERICA, N.A.

32-1/1110

DATE

8/25/2014

704847

119.80

PAY

CHECK NUMBER

VOID AFTER 90 DAYS

AMOUNT

00704847

\$119.80***

ONE HUNDRED NINETEEN AND 80 / 100 DOLLARS

TO

OWNER NUMBER

NEW139

BLYNTHIA NEWHOUSE

TWO SIGNATURES REQUIRED OVER \$1000



Dotails on back

Security Features Included

\$0090A0***

Sabine Oil & Gas LLC Doc 41 Entered 10/15/14 16:22:32 Page 6 of 8

1415 Louisiana Ste 1600 Houston, TX 77002

, BLYNTHIA J NEWHOUSE

Owner Inquiries: (832) 242-9575 sabine oil & gas Vendor Inquiries: (832) 242-9573 607016

Page 1 of 3

Check Date: 08/26/2014

Amount:

75.62

	erty # Property Name				ST	ST County				Operator Name				
Sale Mo/Yr	R BBL D MC	GRAV Pri		Gross Taxes	Gross Deducts	Net Value	Decimal Interest	In Ty	Owne	s Ta:	Owner State		Deduct Amount	Owner Net Value
06/14		CAIN PAULA O				TX H	ARRISON	-		5455			1	10,00
06/14			0.00	0.52		-0.52	0.00016067	RI	0.00	REG	E OIL & GA	s iic		
06/14			0.00	-12.76	170.14	-157.38	0.00016067							0.00
06/14	•	3.1		-1.89	11.76	-23.26	0.00016067			SEV	0.00	TR	0.03	-0.03
06/14		4.7		261.49		3225 10	0.00016067			SEV	0 00	TRP	0.00	0.00
			-81.23	-6.09		-75.14	0.00016067			SEV	0.04			0.52
06/14	•		0.00	-12.38	165.01	-152.63	0.00016067			SEV	0.00			-0.01
06/14 (0177.78	3.58		74.20	9.00016067		•	SEV	0 00	COM	0.03	-0.03
	54.81		92.26	6.92		85.34	0.00016067	RI		SEV	3.00			0.01
6338		AIN PAULA 00	12				RRISON	RI	0.01	SEV	0.00			0.01
06/14 0	•		0.00	0.71		-0.71				SABINE	OIL & GAS	LLC		
06/14 G			0.00	-17.57	234.20	-216.71	0.00016067	RI		REG	0.00			0.00
06/14 G	-	3.19	-18.43	-2.60	16.19	-32.02	0.00016067	RI		SEV	9.00	TR	0.04	-0.04
06/14 G		4.72	4800.76	360.06	=		0.00016067	RI		SEV	0 00	TRP	0.00	0.00
06/14 G	0		-111.85	-8.39		4440.70	0.00016067	RI	0.77	SEV	J 36			0.71
06/14 G	0		0.00	-17.01		-103.46	0.00016067	RI	0.02	SEV	3.00			-0.02
6/14 C	1.02	101.0	02103.04	4.74	-	-209.82	0 00016067	RI	0.50	SEV	0 00	COM	0.04	-0.04
6/14 P	75.47	1.68		9.53		98.30	0 00016067	RI	0 02	SEV	0.00			0.02
339	c	IN PAULA 00		7.33		117 50	0 00016067	RI	0 02	sev	3 30			0.02
6/14 G			0.00				URISON			SABINE		tic		5.52
6/14 G	0		0.00	1.26		-1 26	00016067	RI	2 30	REG	3 00			
6/14 G	-10	3.19	-32.89	-31.34		-386.57	0 00016067	RI	3.00	SEV	.0 01	TR	0.37	0.00
6/14 G	1815	4.72	*563.83	-4.63		-57.13	0.00016067	RI	-0.01	SEV	0.00	TRP	- -	-0.06
6/14 G	0	4.72	-199.54	642.29		7921.54	0.00016067	RI	1 36	SEV	0.10	144	0.00	-0.01
6/14 G	ō			-14.97		184.57	0.00016067	RI	-0.03	SEV	0.00			1.28
	1.53	101 -	0.00	-30.20	402 68 -	372.48	0 00016067		0 00	SEV		••••		-0.03
6/14 P	134.62		2154.56	7 11	1	47 45	0.00016067	RI	3.03	SEV	2 20	COM	0.07	-0.07
340		1.68		17.00	2	09.60			0.04	SEV	0 00			0.03
5/14 G	,	IN PAULA 004				TX HAR	RISON	•••	• ••		0.00			0.04
5/14 G			0.00	0.38	-	ō.38		RI	0 00		OIL & GAS	LLC		
7/14 6	<u> </u>		0.00	-9.78		120.61				REG	0.00			0.00
			-				70010007	~1	0.00	SEV	0 00	TR	0.02	-0.02

Continued...

Did you know that you can receive payments electronically? A simple online subscription makes it easy to signup for ACH payments, payment notifications, and remittance download services. Learn more and signup at http://signup.paynetexchange.com. Your subscription code is H7T2TMW2.

FOR SECURITY PURPOSES, THE BACK OF THIS DOCUMENT CONTAINS AN ARTIFICIAL WATERMARK

Sabine Oil & Gas LLC 1415 Louisiana Ste 1600 Houston, TX 77002

Owner inquiries: (832) 242-9575 abine oil & gas Vendor Inquiries: (832) 242-9573 **BBVA Compass**

607016

VOID AFTER 90 DAYS

	THE THE TENT OF BATT	<u> </u>
CHECK NUMBER	DATE	AMOUNT
607016	08/26/2014	\$*****75.62

PAY EXACTLY Seventy Five And 62/100 Dollars

TO THE ORDER OF

BLYNTHIA J NEWHOUSE ...

3182

E Mattson

From: **E Mattson**

Sent: Monday, October 13, 2014 4:52 PM

To: 'Brian McCulliss'

Subject: RE: BK-S 14-13152 Newhouse - Oil Royalties

Thank you for your bid. I will continue to keep you updated.

Erica Mattson Lenard E. Schwartzer, Trustee 2850 S. Jones Blvd., Suite 1 Las Vegas, Nevada 89146 702-307-2022 ext. 111

From: Brian McCulliss [mailto:bpm@mccullissoil.com]

Sent: Monday, October 13, 2014 4:41 PM

To: E Mattson

Subject: RE: BK-S 14-13152 Newhouse - Oil Royalties

I will go to \$16,000.00. Thank you.

Brian McCulliss



Oil & Gas Minerals & Royalties

PO Box 221515 Denver, CO 80222 303-758-9785 office 303-999-1803 cell 303-300-9020 fax bpm@mccullissoil.com

From: E Mattson [mailto:EMattson@s-mlaw.com]

Sent: Friday, October 10, 2014 11:42 AM

To: Brian McCulliss

Subject: RE: BK-S 14-13152 Newhouse - Oil Royalties

Mr. McCulliss,

We received an offer of \$14,750.00 for the estate's interest in the oil royalties. Would you like to increase your bid?

Erica Mattson Lenard E. Schwartzer, Trustee 2850 S. Jones Blvd., Suite 1 Las Vegas, Nevada 89146 702-307-2022 ext. 111

Case 14-13152-abl Doc 41 Entered 10/15/14 16:22:32 Page 8 of 8

From: Brian McCulliss [mailto:bpm@mccullissoil.com]

Sent: Friday, October 03, 2014 12:41 AM

To: E Mattson

Subject: RE: BK-S 14-13152 Newhouse - Oil Royalties

Erica,

Thank you for the opportunity to increase my bid. I will go to \$14,600.00. Please keep me informed of any updates. Thank you.

Brian McCulliss



PO Box 221515 Denver, CO 80222 303-758-9785 office 303-999-1803 cell 303-300-9020 fax bpm@mccullissoil.com

From: E Mattson [mailto:EMattson@s-mlaw.com]
Sent: Thursday, October 02, 2014 12:43 PM

To: bpm@mccullissoil.com

Subject: BK-S 14-13152 Newhouse - Oil Royalties

Mr. McCulliss,

I would like to notify you that we have received another bid in the estate's interest in Ms. Newhouse's oil rights. The offer received was for \$14,248.00 and we will prepare our motion to sell. If you would like to submit a counter offer, please do so as soon as possible.

Thank you!

Erica Mattson Lenard E. Schwartzer, Trustee 2850 S. Jones Blvd., Suite 1 Las Vegas, Nevada 89146 702-307-2022 ext. 111

Total Control Panel

Login

To: emattson@s-mlaw.com

Remove this sender from my allow list

From: bpm@mccullissoil.com

You received this message because the sender is on your allow list.